

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS EASTERN DIVISION**

JULIE HODGE,)	
)	1:24-cv-02226
Plaintiff,)	
)	
and)	Judge Jorge L. Alonso
)	
NORTHEAST ILLINOIS REGIONAL)	
COMMUTER RAILROAD)	
CORPORATION, d/b/a METRA)	
)	
Defendant.)	

**PARTIES' AGREED MOTION FOR EXTENSION OF
TIME TO COMPLETE FACT DISCOVERY**

Plaintiff, JULIE HODGE, and Defendant NORTHEAST ILLINOIS REGIONAL COMMUTER RAILROAD CORPORATION, d/b/a METRA by and through their undersigned attorneys respectfully requests that this Court extend the deadline to complete fact discovery and to file dispositive motions and in support of this motion states the following:

1. The initial Complaint in this matter was filed on March 18th, 2024.
2. On March 19, 2024, Plaintiff filed her First Amended Complaint.
3. On May 6, 2024, Plaintiff filed her Second Amended Complaint in this matter.
4. On August 9, 2024, the Defendants filed an Answer to Plaintiff's Second Amended Complaint.
5. On June 25, 2024, this Honorable Court set the deadline for the close of fact discovery as December 20, 2024.

6. Written discovery has been exchanged in this matter.
7. On December 16, 2024, the parties filed the motion for an extension of time to complete discovery.
8. On December 26, 2024, this Honorable Court granted the parties' motion for an extension of time to complete discovery, extending the time to complete discovery until March 31, 2025.
9. On February 26, 2025, the parties file another motion for an extension of time to complete discovery because Plaintiff informed her counsel of an upcoming surgery and a subsequent 8-week recovery period, because the parties have been unable to schedule depositions in this matter, and because Defendant's counsel has not yet received executed HIPAA and Illinois Mental Health Confidentiality Act authorizations from Plaintiff, so that it can subpoena Plaintiff's medical records, which are at issue in this matter.
10. On February 27, 2025, the Honorable Court granted the parties motion for an extension of time to complete discovery, extending the time to complete discovery until May 22, 2025, and requiring that Plaintiff provide HIPAA and Illinois Mental Health Confidentiality Act authorizations to Defendant by March 10, 2025.
11. On March 11, 2025, Plaintiff provided her HIPAA authorization to Defendant but was not able to provide her Illinois Mental Health Confidentiality Act authorization to Defendant until April 9, 2025 because she was not able to get it notarized due to her recovery.
12. Immediately upon receipt, Defendant issued a subpoena with Plaintiff's medical authorizations for her medical records from her disclosed medical provider. However, on May 9, 2025, the subpoena was returned to sender, as the provider and/or address provided by Plaintiff for her medical provider was incorrect.

13. On May 12, 2025, Defendant informed Plaintiff of this, requesting that Plaintiff supplement her interrogatory answers with accurate information and provide accurate medical authorizations, so that Defendant issue a new subpoena for Plaintiff's medical records.
14. The Parties have been working to depositions of Defendant's employees, and those depositions will be proceeding.
15. However, because Plaintiff needs to provide supplemental interrogatory answers and medical authorizations for her medical provider, the parties need additional time to complete discovery, particularly third party discovery and Plaintiff's deposition.
16. In addition, defense counsel has a trial on June 9, and both defense counsel and Plaintiff's counsel have a trial together in another matter on July 21, 2025.
17. Accordingly, the parties need more time to complete fact discovery and a new deadline for dispositive motions.
18. The parties request up to and including August 30, 2025 to complete fact discovery and a dispositive motion deadline 30-45 days after the completion of discovery.
19. No prejudice will be suffered by either party if this Honorable Court were to grant the requested extension.

WHEREFORE, JULIE HODGE, and Defendants NORTHEAST ILLINOIS REGIONAL COMMUTER RAILROAD CORPORATION, d/b/a METRA by and through their undersigned attorneys respectfully requests that this Court grant an extension of the deadline to complete witness depositions up to and including August 30, 2025 and a dispositive motion deadline 30-45 days after the completion of discovery.

Dated: May 12, 2025

Respectfully Submitted,

/s/Kendra D. Spearman

Kendra D. Spearman

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CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2025, I served the foregoing document upon all counsel of record by filing a copy with the Clerk of the Northern District of Illinois using the Court's electronic filing system.

/s/Kendra D. Spearman
Kendra D. Spearman
Attorney for the Plaintiff